

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT

COMMONWEALTH

v.

**MOTION FOR DISCOVERY OF EXPERT'S PROCEDURES**

Now comes the defendant and respectfully requests that the Commonwealth provide him with the following in reference to the proposed testimony of its three experts on drug analysis:

1. A copy of the "Basic Training Program for Forensic Drug Chemists" manual and or any other manuals or workbooks used by the Commonwealth's experts in conducting their respective laboratory tests.
2. A list of all the learned treatises, articles and journals or other books and publications the expert used or consulted to substantiate her findings.
3. A designation of what tests the experts performed such as color reagents; gas chromatograph; infrared spectrophotometer; mass spectrometer; nuclear magnetic resonance; atomic absorption; etc. and the specific type/model of equipment used to perform the tests.
4. The established error rate for each methodology employed by each of the Commonwealth drug analysis experts.

Defendant states that this information is necessary in order for him to mount a solid defense and effectively cross examine the Commonwealth witnesses. Further, there is no prejudice to the Commonwealth by providing such information.

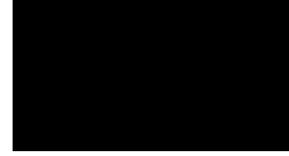
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SUPERIOR COURT  
FBI CRIMINAL DIVISIONS  
SUPERIOR COURT

By his attorney,



James S. Dilday  
Dilday & Associates, LLC



Certificate of Service

I, James S. Dilday, certify that I served a copy of the within motion on assistant District Attorney Gregory Henning by delivering same in hand to the Suffolk District Attorney's office at One Bullfinch Place Boston, MA .

December 29, 2009



James S. Dilday